

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
<i>Plaintiff,</i>	)	
v.	)	<b>23 CR 28</b>
	)	<b>Honorable Edmond E. Chang</b>
<b>JEFF MCGRAW,</b>	)	
<i>Defendant.</i>	)	

**APPOINTED COUNSEL’S MOTION TO WITHDRAW**

NOW COMES YELENA A. DOLGOSHEEVA, appointed to represent Defendant JEFF MCGRAW under the Criminal Justice Act, and respectfully moves this Honorable Court to grant her leave to withdraw. In support of this motion counsel states as follows:

1. The irretrievable breakdown in communication between the undersigned and Mr. McGraw have resulted in a fundamental disagreement as to the prosecution of this matter. Mr. McGraw and the undersigned have attempted to resolve these issues without success.
2. On April 15, 2024, Mr. McGraw requested counsel to withdraw from his case. On the same day counsel received a communication from a family member requesting a telephone call prior to withdrawal from the case. The following day counsel spoke to the family member who communicated to counsel a request not to file a motion to withdraw and to schedule a teleconference with Mr. McGraw. On April 18, 2024, counsel spoke to Mr. McGraw concerning issues relevant to his case and towards the end of the call Mr. McGraw requested again for counsel to withdraw from his case.
3. Mr. McGraw requests a subsequent attorney be appointed to represent him.

WHEREFORE, Counsel Yelena A. Dolgosheeva respectfully moves this Honorable Court to grant her leave to withdraw as Mr. McGraw’s attorney.

Respectfully submitted,  
/s/Yelena A. Dolgosheeva

DolTer Law, P.C.  
Mailing Address: P.O. Box 5382, Buffalo Grove, Illinois 60089  
Telephone: 847-208-4348  
Fax: 312-267-1810  
E-mail: dolgosheeva2002@yahoo.com